

**TROY LAW, PLLC**

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March 23, 2021 **MEMORANDUM ENDORSED****Via ECF**

Hon. Gregory H. Woods, U.S.D.J.  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

**Re: Motion (at the Request of *Pro Se* Defendants) for Extension of Time to File  
 Pretrial Order and Other Pretrial Materials &  
 Motion for Leave to File Document Under Seal**  
*Zhang v. Four Seasons Beauty Spa, Inc.*, No. 18-cv-08259 (GHW), (S.D.N.Y.)

Your Honor,

We represent the Plaintiff in the above-referenced matter. We write respectfully, at the request of, with the consent of, and having conferred with, the *pro se* Defendants, to request a 21-day extension of time to file the proposed pretrial order and other pretrial materials due in this matter on May 24, 2021. This extension if granted would place the due date on April 14, 2021, and would not impact any other pending deadlines.

The *pro se* Defendants have asked us to make this request to accommodate Xia Zhuo, who has contracted a disease that will make it difficult or impossible for her to participate in the preparation of the pretrial order or other pretrial materials for 10 or more days. To the extent the Court requires a documentary showing that Ms Zhuo has in fact contracted such a disease and will be indisposed for 10 or more days, we are in possession of such a document and request leave to file it under seal.

We emailed Plaintiffs' portion of the pretrial order to the *pro se* Defendants so that they could input their portion on March 22, 2021. That same evening, Shenhua Wang emailed us saying that Ms Zhuo had contracted a disease, and asking us to ask the Court for an extension of time to file the pretrial order and other pretrial materials. Mindful of Your Honor's insistence at the February 24, 2021 conference that this filing deadline be kept, we asked for proof of Ms Zhuo's illness to show the Court. At around midnight today, March 23, 2021, Mr. Wang forwarded us an email Ms Zhuo had received from CityMD containing her diagnosis. It is apparent from the email (which is the document we seek leave to file under seal should the Court wish to examine it—we do not attach it hereto pursuant to Rule 4(A) of the Court's Individual Practices, as it contains sensitive medical information) that Ms Wang was diagnosed on March 22, 2021 at CityMD, and that her doctor recommended that she self-quarantine for at least 10 days while her illness ran its course.

We conferred with Mr. Wang by telephone today at about 6:20 PM today, and he stated that the *pro se* Defendants had no preference as to the length of extension. We are therefore requesting 21 days because 1) Ms Zhuo may or may not be ready to resume her normal activity

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after 10 days and should have a reasonable buffer; and 2) I have arbitration hearings scheduled the weeks of March 29 and April 5.

We apologize for any inconvenience to the Court, and thank the Court for its attention to and consideration of this matter.

Respectfully submitted,  
TROY LAW, PLLC

/s/ Aaron B. Schweitzer


Aaron B. Schweitzer  
*Attorney for Plaintiffs*

cc: via ECF  
all counsel of record

Application granted. The parties' request to extend the deadline for submission of pretrial materials, Dkt. No. 129, is granted. The deadline for the parties to submit pretrial materials is extended to April 14, 2021. Plaintiffs' counsel is directed to serve a copy of this order on Defendants. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 129.

SO ORDERED.

Dated: March 24, 2021  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge